

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TERRENCE J. HANCOCK, et al.,                          )  
   )  
   )  
Plaintiffs,   ) CIVIL ACTION  
   )  
   )  
vs.   ) NO. 20 C 283  
   )  
DI'JON, INC., an Illinois corporation,                 ) JUDGE JOAN B. GOTTSCHALL  
   )  
   )  
Defendant.   )

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, DI'JON, INC., an Illinois corporation, in the total amount of \$3,497.26, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,952.50.

On January 23, 2020, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to his employee, Debbie Callell) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 13, 2020. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.<sup>1</sup>

/s/ Cecilia M. Scanlon

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<sup>1</sup>Since Defendant has not appeared by counsel, Plaintiffs are unable to determine whether the instant Motion is opposed.

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 16th day of July 2020:

Mr. Dennis M. Michon, Registered Agent  
Michon & Buckley  
15255 S. 94th Avenue, Suite 205  
Orland Park, IL 60462

Ms. Diane Jacobi, President  
Di'Jon, Inc.  
3442 W. 198th Street  
Homewood, IL 60422-1267

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/s/ Cecilia M. Scanlon

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